Southern Nuclear

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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC 2.6.09.13a [Index Number 652]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.6.09.13a [Index Number 652]. This ITAAC confirms that the central and secondary alarm stations have conventional (landline) telephone service with the main control room and local law enforcement authorities. This ITAAC also confirms that the central and secondary alarm stations are capable of continuous communication with security personnel. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, “Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52,” which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.6.09.13a [Index Number 652]

JMC/SRV/sfr

cc: Regional Administrator, Region ll
Director, Office of Nuclear Reactor Regulation (NRR)
Director, Vogtle Project Office NRR
Senior Resident Inspector – Vogtle 3 & 4

Southern Nuclear Operating Company
ND-23-0461
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.6.09.13a [Index Number 652]

ITAAC Statement

Design Commitment

13.a) The central and secondary alarm stations have conventional (landline) telephone service with the main control room and local law enforcement authorities.

13.b) The central and secondary alarm stations are capable of continuous communication with security personnel.

Inspections/Tests/Analyses

Tests, inspections, or a combination of tests and inspections of the central and secondary alarm stations' conventional telephone services will be performed.

Tests, inspections, or a combination of tests and inspections of the central and secondary alarm stations' continuous communication capabilities will be performed.

Acceptance Criteria

The central and secondary alarm stations are equipped with conventional (landline) telephone service with the main control room and local law enforcement authorities.

The central and secondary alarm stations are equipped with the capability to continuously communicate with security officers, watchmen, armed response individuals, or any security personnel that have responsibilities during a contingency event.

ITAAC Determination Basis

Tests, inspections, or a combination of tests and inspections of the central and secondary alarm stations' conventional telephone services and continuous communication capabilities were performed to verify the central and secondary alarm stations are equipped with conventional (landline) telephone service with the main control room and local law enforcement authorities and to verify the central and secondary alarm stations are capable of continuous communication with security personnel. The Vogtle Electric Generating Plant (VEGP) Unit 4 Plant Security System ITAACs only cover the Unit 4 plant security system design commitment scope.

13.a) The central and secondary alarm stations are equipped with conventional (landline) telephone service with the main control room and local law enforcement authorities.

Testing was performed per ITAAC Technical Report SV4-SES-ITR-800652 (Reference 1) to verify that the central alarm station (CAS) and the secondary alarm station (SAS) are equipped with conventional (landline) telephone service with the Unit 4 main control room and local law enforcement authorities and satisfy the applicable conventional (landline) communications requirements of the VEGP Units 1-4 Physical Security Plan associated with 10 CFR 73.55(j)(4).

The communications test between the CAS/SAS and the Unit 4 main control room was conducted by making a phone call using a conventional (landline) telephone from the CAS/SAS to the Unit 4 main control room and confirming verification of voice transmission and reception between the CAS/SAS and the Unit 4 main control room.

The communications test between the CAS/SAS and the local law enforcement authorities was

conducted per ITAAC Technical Report SV3-SES-ITR-800652 (Reference 2) by making a phone call using a conventional (landline) telephone from the CAS/SAS to the local law enforcement authorities listed in VEGP Procedure 90017-C (Reference 3) and confirming verification of voice transmission and reception between the CAS/SAS and the local law enforcement authorities.

The results of the above testing are documented in References 1 and 2 and verify the central and secondary alarm stations are equipped with conventional (landline) telephone service with the main control room and local law enforcement authorities.

13.b) The central and secondary alarm stations are equipped with the capability to continuously communicate with security officers, watchmen, armed response individuals, or any security personnel that have responsibilities during a contingency event.

Testing was performed per ITAAC Technical Report SV4-SES-ITR-800652 (Reference 1) to verify that the CAS and SAS are equipped with the capability to continuously communicate with security personnel (security officers, watchmen, armed response individuals, or any security personnel that have responsibilities during a contingency event) and satisfy the applicable continuous communications requirements of the VEGP Units 1-4 Physical Security Plan associated with 10 CFR 73.55(j)(3).

The continuous communications test between the CAS/SAS and security officers, watchmen, armed response individuals, or security personnel that have responsibilities during a contingency event was conducted using continuous communications testing methods similar to those identified in Reference 3. The continuous communications methods used at VEGP Unit 4 include portable Ultrahigh Frequency (UHF) primary security radios, portable Very High Frequency (VHF) radios, and security intercom communication stations.

Portable UHF security radio testing was conducted between the CAS/SAS and security officers at locations similar to those that would be accessed by security officers and watchmen performing duties required by the VEGP Units 1-4 Physical Security Plan. Portable VHF radio testing was also conducted between the CAS/SAS and security officers. Intercom communication station testing was conducted between CAS/SAS and security officers at the local intercom communication stations located in VEGP Unit 4. The testing contacts and confirms voice transmission and reception between the CAS/SAS and a security officer assigned a portable UHF security radio, a security officer assigned a VHF radio, and each intercom system station located in VEGP Unit 4. Armed response individuals and security personnel that would have responsibilities during a contingency event utilize the applicable portable UHF security radios, VHF radios, and intercom communication stations tested above.

The results of the above testing are documented in Reference 1 and verify the central and secondary alarm stations are equipped with the capability to continuously communicate with security officers, watchmen, armed response individuals, or any security personnel that have responsibilities during a contingency event.

The test results contained in References 1 and 2 provide evidence that the ITAAC Acceptance Criteria requirements are met:

- The central and secondary alarm stations are equipped with conventional (landline) telephone service with the main control room and local law enforcement authorities; and

- The central and secondary alarm stations are equipped with the capability to continuously communicate with security officers, watchmen, armed response individuals, or any security personnel that have responsibilities during a contingency event

References 1 and 2 are available for NRC inspection as part of the Unit 4 ITAAC 2.6.09.13a Completion Package (Reference 4).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there were no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.6.09.13a (Reference 4) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.6.09.13a was performed for VEGP Unit 4 and that the prescribed acceptance criteria was met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV4-SES-ITR-800652, SES Communications: ITAAC 2.6.09.13a, Rev 0 (SRI)
2. SV3-SES-ITR-800652, SES Communications: ITAAC 2.6.09.13a, Rev 0 (SRI)
3. Procedure 90017-C, Security Radio and Communications System, Version 34.0
4. 2.6.09.13a-U4-CP-Rev0, ITAAC Completion Package